

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
ERIN GETTEL
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577
5 Erin_Gettel@fd.org

6 Attorney for Anoy Lopez-Bles

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 ANOY LOPEZ-BLES,

14 Defendant.

Case No. 2:18-cr-00010-RFB-CWH

**STIPULATION TO CONTINUE
RESPONSE DEADLINE**
(first request)

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United
17 States Attorney, and Richard Anthony Lopez, Assistant United States Attorney, counsel for the
18 United States of America, and Rene L. Valladares, Federal Public Defender, and Erin Gettel,
19 Assistant Federal Public Defender, counsel for Anoy Lopez-Bles, that the government's
20 deadline to respond to Lopez-Bles's motion for relief from improper joinder [ECF No. 32],
21 currently set for August 8, 2018, be extended to August 13, 2018.
22
23
24
25
26

1 This Stipulation is entered into for the following reasons:

2 1. The government has recently communicated a new plea offer to counsel for
3 Anoy Lopez-Bles.

4 2. Defense counsel needs time to discuss the offer with Lopez-Bles.

5 3. If the parties reach a plea agreement, the pending motion would be moot.

6 4. The parties agree to the continuance.

7 5. The additional time is not sought for purposes of delay, but to allow defense
8 counsel sufficient time to discuss all alternatives with Lopez-Bles.

9 6. Denial of the request for an extension could result in a miscarriage of justice.

10 DATED this 3rd day of August, 2018.

11
12 RENE L. VALLADARES
Federal Public Defender

DAYLE ELIESON
United States Attorney

13
14 */s/ Erin Gettel*
By _____

15 ERIN GETTEL
Assistant Federal Public Defender

/s/ Richard Anthony Lopez
By _____

RICHARD ANTHONY LOPEZ
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ANOY LOPEZ-BLES,

7 Defendant.

Case No. 2:18-cr-00010-RFB-CWH

ORDER

8
9
10 **FINDINGS OF FACT**

- 11 1. The government has recently communicated a new plea offer to counsel for Anoy
- 12 Lopez-Bles.
- 13 2. Defense counsel needs time to discuss the offer with Lopez-Bles.
- 14 3. If the parties reach a plea agreement, the pending motion would be moot.
- 15 4. The parties agree to the continuance.
- 16 5. The additional time is not sought for purposes of delay, but to allow defense
- 17 counsel sufficient time to discuss all alternatives with Lopez-Bles.
- 18 6. This is the first request for an extension for the briefing schedule on Lopez-
- 19 Bles's motion for relief from improper joinder.
- 20 7. Denial of the request for an extension could result in a miscarriage of justice.

21 **CONCLUSIONS OF LAW**

- 22 8. For all of the above-stated reasons, there exists good cause for, and the ends of
- 23 justice would be served best by, a continuance of the government's response deadline.
- 24
- 25
- 26

ORDER

IT IS HEREBY ORDERED that the deadline for the government's response to the Lopez-Bles's motion for relief from improper joinder [ECF No. 32] be extended to August 13, 2018.

DATED this 6th day of August, 2018.



HONORABLE RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE